

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion into the appropriate regulatory plan to succeed price cap regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' retail intrastate telecommunications services in the Commonwealth of Massachusetts

DTE 01-31

**AT&T'S FIRST SET OF INFORMATION
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits to Verizon the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
7. Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

INFORMATION REQUESTS

1. Please identify and provide, pursuant to a mutually agreeable protective agreement, a list of all companies in the "COMPANY ID" field referenced in your response to AG-VZ 2-5, part g.
2. Please refer to the E911 documentation found at the internet site identified in Verizon's response to AG-VZ 2-5, part e, and specifically to the VERIZON REGIONAL E911 PS/ALI GUIDE, which lists the following classes of service to be identified for each listing in the E911 database:
 - 1 - Residence
 - 2 - Business
 - 3 - Residence Private Branch Exch (PBX)
 - 4 - Business PBX
 - 5 - Centrex
 - 6 - Coin - one way
 - 7 - Coin - two way
 - 8 - Mobile
 - 9 - Off-premise extension, Residence
 - 0 - Off-premise extension, Business
 - a) Please provide, pursuant to a mutually agreeable protective agreement, a list of the companies in the E911 database which provide each of the foregoing classes of service.
 - b) Please provide the total number of companies which have listings for each of the foregoing classes of service.
3. Based on your knowledge of the E911 rules requiring the listing of telephone numbers in the E911 database, please state whether a telecommunications provider in the following hypothetical situations is required to register a telephone number in the E911 database:
 - a) Telecommunications provider provides local and long distance service from its own switch to an end-user with a PBX switch over facilities obtained from Verizon pursuant to Verizon's special access tariffs (calls can originate from the end-user);
 - b) Telecommunications provider provides mobile wireless service from its own switch to an end-user customer who can originate calls on that customer's number;

- c) Telecommunications provider provides payphone service to the public using lines leased from Verizon.

Please explain your answers and cite to and provide copies of all documentation that supports your answer.

Respectfully submitted,

AT&T COMMUNICATIONS OF
NEW ENGLAND, INC.

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